

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (PHILADELPHIA)**

TIMOTHY M. HOLLINGER

xxx-xx-0474

Debtor.

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:CHAPTER 13  
:CASE NO. 21-10199/MDC

U.S. BANK NATIONAL ASSOCIATION  
AS LEGAL TITLE TRUSTEE FOR  
TRUMAN 2016 SC6 TITLE TRUST

Movant,

V.

TIMOTHY M. HOLLINGER

Debtor,

:Hearing Date: October 12, 2021 at 10:30 a.m.

WILLIAM C. MILLER

Trustee,

Respondents.

**STIPULATION RESOLVING MOTION BY U.S. BANK NATIONAL  
ASSOCIATION AS LEGAL TITLE TRUSTEE FOR TRUMAN 2016 SC6 TITLE  
TRUST RELIEF FROM THE AUTOMATIC STAY TO PERMIT MOVANT TO  
EXERCISE ITS RIGHTS UNDER STATE LAW AGAINST CERTAIN REALTY  
KNOWN AS 454 SCHOOL LANE, HARLEYSVILLE, PENNSYLVANIA 19438**

THIS matter being opened to the Court by Emmanuel J. Argentieri of the law office of Romano Garubo & Argentieri, counsel for the secured creditor, US Bank NA as Legal Title Trustee for Truman 2016 SC6 Title Trust, (hereinafter “US Bank”), upon the filing of a motion for relief from stay as to real property, more commonly known as 454 SCHOOL LANE, HARLEYSVILLE, PENNSYLVANIA 19438; and George R. Tadross, Esquire of the Tadross

Law Firm having filed an answer thereto on behalf of the Debtor; and it appearing that the parties have amicably resolved their differences and for good cause shown;

1. If any valid proofs of payment are produced by the Debtor, his post-petition mortgage account shall be adjusted accordingly.

2. The Debtor is currently due for the May 25, 2021 through August 25, 2021 post-petition monthly mortgage payments, which are broken down as follows:

1 times payment of \$1,491.46 (5/25/21), plus 3 times payment of \$1,493.37 (6/25/21 - 8/25/21), Less suspense balance of \$118.99.

The total due to US Bank post-petition totals \$5,852.58, along with the reimbursement of US Bank's attorney fees totaling \$1,050.00, for a total of \$6,902.58.

3. Debtor shall tender his September 25, 2021 payment timely.

4. Commencing with the October 25, 2021 post-petition payment and continuing each month thereafter through and including May 25, 2022, Debtor shall cure the aforesaid arrearages by remitting regular monthly mortgage payments, plus 1/8 of the above arrearage (\$862.83).

5. Commencing with the June 25, 2022 post-petition mortgage payment and continuing each month thereafter for the duration of this Chapter 13 proceeding, Debtor shall remit payments directly to US Bank as same come due.

6. The provisions of this stipulation do not constitute a waiver by the Moving Party of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.

7. If the case is converted to Chapter 7, US Bank shall file a Certification of Default with the Court and the Court shall enter an Order granting it relief from the automatic stay.

8. If any of the aforementioned stipulation payments and/or regular monthly mortgage payments commencing after the cure of the post-petition delinquency are more than thirty (30) days late, US Bank may send Debtor a written notice of default of this Stipulation. If the default is not cured within ten (10) days of the date of the notice, counsel for US Bank may file a Certification of Default with the Court and the Court shall enter an Order granting it relief from the automatic stay as to the mortgaged property herein.

*The undersigned hereby consent to the form and entry of the within order.*

/S/EMMANUEL J. ARGENTIERI

Emmanuel J. Argentieri, Esquire  
Attorney for US Bank

Date: 11/9/2021

/S/GEORGE R. TADROSS

George R. Tadross, Esquire  
Attorney for Debtor

Date: 11/12/2021

/S/LEEANE O. HUGGINS

LeeAne O. Huggins, Esquire

For: Kenneth E. West, Chapter 13 Trustee Date: 11/12/2021

*No Objection*

**AND NOW, this 15th day of November 2021, it is hereby ORDERED that the foregoing Stipulation is approved, shall be, and is made an Order of this Court.**



**Magdeline D. Coleman**  
**Chief U.S. Bankruptcy Judge**